

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Shavonne Daniels, individually and on behalf  
of all others similarly situated,

Plaintiff,

Case No.: **1:24-cv-01363-CCC**

The GIANT Company, LLC,

Defendant.

**NOTICE OF VOLUNTARY DISMISSAL**

Plaintiff Shavonne Daniels (“Plaintiff”), by and through undersigned counsel, hereby gives notice pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, that the above-captioned action is voluntarily dismissed, without prejudice against the Defendant, The GIANT Company, LLC (“Defendant”). Defendant has not served an answer or motion for summary judgment in this action. Furthermore, Plaintiff has not previously dismissed any federal or state court action based on or including the same claims. Accordingly, Plaintiff notices voluntary dismissal of this action, without prejudice.

Dated: October 18, 2024

Respectfully submitted,

/s/ Gary F. Lynch  
Gary F. Lynch  
Lynch Carpenter, LLP  
1133 Penn Avenue, 5th Floor  
Pittsburgh, PA 15222  
412-322-9243  
Email: [Gary@lcllp.com](mailto:Gary@lcllp.com)

-AND-

Paul J. Doolittle, Esq.  
**POULIN | WILLEY | ANASTOPOULO, LLC**  
32 Ann Street  
Charleston, SC 29403  
Telephone: (803) 222-2222  
E-mail: [Paul.doolittle@poulinwilley.com](mailto:Paul.doolittle@poulinwilley.com)  
[cmad@poulinwilley.com](mailto:cmad@poulinwilley.com)

*Attorneys for Plaintiff*